

1 DANIEL T. HAYWARD (SBN 5986)  
2 LAXALT & NOMURA, LTD.  
3 9790 Gateway Drive – Suite 200  
4 Reno, Nevada 89521  
5 Telephone: (775) 322-1170  
6 Facsimile: (775) 322-1865  
7 [dhayward@laxalt-nomura.com](mailto:dhayward@laxalt-nomura.com)

8 ADAM H. FLEISCHER (Illinois Bar No. 6224928)  
9 (admitted *pro hac vice*)  
10 JOHN A. HUSMANN (Illinois Bar No. 6273392)  
11 (admitted *pro hac vice*)  
12 JOANNA G. SWARTOUT (Illinois Bar No. 6305993)  
13 (admitted *pro hac vice*)  
14 BATESCAREY LLP  
15 191 North Wacker, Suite 2400  
16 Chicago, Illinois 60606  
17 Telephone: (312) 762-3100  
18 Facsimile: (312) 762-3200  
19 [afleischer@batescarey.com](mailto:afleischer@batescarey.com)  
20 [jhusmann@batescarey.com](mailto:jhusmann@batescarey.com)  
21 [jswartout@batescarey.com](mailto:jswartout@batescarey.com)  
22 *Attorneys for Plaintiff,*  
23 *Rockhill Insurance Company*

15  
16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 ROCKHILL INSURANCE COMPANY,  
19 Plaintiff,  
20 v.  
21 CSAA INSURANCE EXCHANGE D/B/A  
22 AAA INSURANCE EXCHANGE; PREMIER  
23 RESTORATION AND REMODEL, INC.  
24 Defendants.

25 Case No.: 3:17-cv-00496-HDM-WGC

26 **STIPULATION AND ORDER EXTENDING TIME BY WHICH**  
27 **PLAINTIFF MAY FILE REPLY IN SUPPORT OF MOTION FOR**  
28 **JUDGMENT ON THE PLEADINGS (FIRST REQUEST)**

26 Plaintiff/Counter-Defendant Rockhill Insurance Company (“Rockhill”), Defendant  
27 CSAA Insurance Exchange d/b/a AAA Insurance Exchange (“CSAA”) and

1 Defendant/Counter-Claimant Premier Restoration and Remodel, Inc. (“Premier”), by and  
2 through their undersigned counsel and pursuant to LR IA 6-1, stipulate and request that the  
3 Court order that Plaintiff may have until and including August 22, 2018, by which to file its  
4 Reply in Support of Motion for Judgment on the Pleadings on Rockhill’s Amended Complaint.  
5 The underlying Motion for Judgment on the Pleadings (ECF No. 64) was filed on July 25,  
6 2018. Defendant CSAA’s Opposition (ECF No. 65) was filed on August 8, 2018. Defendant  
7 Premier’s Joinder in CSAA’s Opposition (ECF No. 66) was filed on August 9, 2018. Plaintiff’s  
8 Reply is presently due on August 15, 2018. This is the first stipulation for an extension of time  
9 to file Plaintiff’s Reply.

10 Plaintiff has requested additional time within which to file its Reply because it is  
11 working diligently to complete written responses and prepare documents responsive to  
12 Defendant CSAA’s Request for Production of Documents and Electronically Stored  
13 Information, which is due on August 15, 2018. In addition, counsel for Plaintiff, who is  
14 principally responsible for drafting its Reply in Support of Motion for Judgment on the  
15 Pleadings on Rockhill’s Amended Complaint is scheduled to be out of the office during the  
16 week of August 13-18, 2018.

17 WHEREFORE, the parties stipulate and request that the Court order that Plaintiff may  
18 have until August 22, 2018, by which to file and serve its Reply in Support of Motion for  
19 Judgment on the Pleadings on Rockhill’s Amended Complaint.

21 DATED this 10 day of August, 2018.

22 LAXALT & NOMURA, LTD.

24 /s/ Daniel T. Hayward

25 DANIEL T. HAYWARD (SBN 5986)  
9790 Gateway Drive – Suite 200  
26 Reno, Nevada 89521  
Telephone: (775) 322-1170  
27 Facsimile: (775) 322-1865

21 DATED this 10 day of August, 2018.

22 THE GRUNSKY LAW FIRM PC

24 /s/ Frederick H. Ebey

25 FREDERICK H. EBEY(CA BN 33802)  
(admitted *pro hac vice*)  
240 Westgate Drive  
Watsonville, CA 95076  
Telephone: (831)722-2444  
26 Facsimile: (831) 722-6153

1 Adam H. Fleischer (Illinois Bar No. 6224928)  
2 (admitted *pro hac vice*)  
3 John A. Husmann (Illinois Bar No. 6273392)  
4 (admitted *pro hac vice*)  
5 Joanna G. Swartout (Illinois Bar No. 6305993)  
6 (admitted *pro hac vice*)  
7 BATES CAREY LLP  
8 191 N. Wacker, Suite 2400  
9 Chicago, IL 60606  
10 Telephone: (312) 762-3100  
11 Facsimile: (312) 762-3200

12  
13 *Attorneys for Plaintiff*  
14 *Rockhill Insurance Company*

15 DATED this 10 day of August, 2018.

16 LAW OFFICE OF LISA A. TAYLOR

17 /s/ Lisa A. Taylor  
18 LISA A. TAYLOR  
19 5664 N. Rainbow Blvd.  
20 Las Vegas, Nevada 89130  
21 Telephone: (702) 645-0150

22 *Attorney for Defendant,*  
23 *Premier Restoration and Remodel, Inc.*

24 **ORDER**

25 IT IS SO ORDERED.

26   
27

28 UNITED STATES DISTRICT JUDGE

29 DATED this 13 day of August, 2018.